

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

ALBERT L. GRAY, ADMINISTRATOR, ET AL.
Plaintiffs

VS.

C.A. NO. 04-312/L

JEFFREY DERDERIAN, ET AL.
Defendants

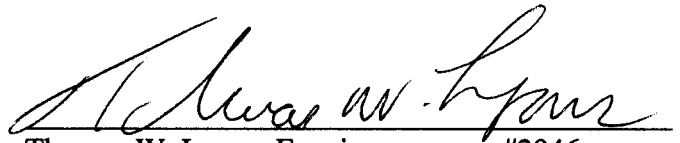
**DEFENDANTS LEGGETT & PLATT INCORPORATED'S AND
L&P FINANCIAL SERVICES CO.'S MOTION TO EXTEND
TIME TO RESPOND TO THE COMPLAINT**

Pursuant to F.R.C.P. 6 and Local Rule 12(1), defendants Leggett & Platt Incorporated and L&P Financial Services Co. hereby move to extend their time to respond to the complaint up to and including September 30, 2004.

As grounds for this motion, defendants state that on August 9, 2004, they were served with the "Master Complaint of [the] Superior Court Plaintiffs' Steering Committee" which names 226 plaintiffs and 58 known and unknown defendants. It includes 610 paragraphs of allegations covering some 127 pages. The allegations against Leggett & Platt begin at paragraph 497 which incorporates by reference the allegations of the previous 496 paragraphs. Those paragraphs include a variety of claims against 29 other defendants. Those claims encompass allegations of criminal conduct, negligence and strict liability arising from many different kinds of conduct and a variety of products. The claims against L&P Financial Services follow those against Leggett & Platt and similarly incorporate all the preceding allegations. To their knowledge, these defendants have not been named in any prior lawsuit arising out of the Station nightclub fire and this was the first time they were served with a summons and complaint.

Accordingly, defendants will need the additional time to research and prepare responses to the allegations.

DEFENDANTS
LEGGETT & PLATT INCORPORATED and
L&P FINANCIAL SERVICES CO.
By their attorneys,



Thomas W. Lyons, Esquire #2946
STRAUSS, FACTOR, LAING & LYONS
222 Richmond Street, Suite 208
Providence, RI 02903-2914
401-456-0700
tlyons@straussfactor.com

CERTIFICATION

I hereby certify that on this 24th day of August, 2004, a copy of the within was mailed to counsel of record as set forth on the attached certificate of service by regular mail, postage prepaid.



Max Wistow, Esq.
WISTOW & BARYLICK INC.
61 Weybosset Street
Providence, RI 02903

Mark S. Mandell, Esq.
MANDELL, SCHWARTZ & BOISCLAIR
One Park Row
Providence, RI 02903

Patrick T. Jones, Esq.
COOLEY MANION JONES, LLP
21 Custom House Street
Boston, MA 02110

Michael A. St. Pierre, Esq.
REVENS, REVENS & ST. PIERRE
946 Centerville Road
Warwick, RI 02886

Stephen E. Breggia, Esq.
BREGGIA, BOWEN & GRANDE
395 Smith Street
Providence, RI 02908

Steven A. Minicucci, Esq.
CALVINO LAW ASSOCIATES
373 Elmwood Avenue
Providence, RI 02907

Eva Marie Mancuso, Esq.
HAMEL, WAXLER, ALLEN & COLLINS
387 Atwells Avenue
Providence, RI 02909

Charles N. Redihan, Esq.
KIERNAN, PLUNKETT & REDIHAN
91 Friendship Street
Providence, RI 02903

Anthony F. DeMarco, Esq.
REYNOLDS, DEMARCO & BOLAND
170 Westminster Street
Providence, RI 02903

James R. Lee
Rhode Island Assistant Attorney General
150 South Main Street
Providence, RI 02903

James H. Reilly, III, Esq.
KELLY, KELLEHER, REILLY & SIMPSON
146 Westminster Street
Providence, RI 02903

James T. Murphy, Esq.
HANSON CURRAN LLP
146 Westminster Street
Providence, RI 02903

Randall Souza, Esq.
Fred A. Kelly, Jr., Esq.
NIXON PEABODY LLP
1 Citizens Plaza
Providence, RI 02903

James Ruggieri, Esq.
Gerald C. DeMaria, Esq.
HIGGINS, CAVANAGH & COONEY
123 Dyer Street
Providence, RI 02903

Howard A. Merton, Esq.
Benjamin V. White, Esq.
VETTER & WHITE
20 Washington Place
Providence, RI 02903

Joseph V. Cavanagh, Esq.
BLISH & CAVANAGH
30 Exchange Terrace
Providence, RI 02903

Thomas C. Angelone, Esq.
HODOSH, SPINELLA & ANGELONE
1 Turks Head Place
Providence, RI 02903

Faith A. LaSalle, Esq.
ZIZIK, LASALLE & POWERS
40 Westminster Street
Providence, RI 02903

Marc DeSisto, Esq.
DESISTO LAW
211 Angell Street
Providence, RI 02911

Donald J. Maroney
28 Caswell Street
Narragansett, RI 02882

William P. Robinson, Esq.
EDWARDS & ANGELL
2800 Financial Plaza
Providence, RI 02903